

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **DATE FILED: March 10, 2011**  
**v.** : **CRIMINAL NO. \_\_\_\_\_**  
**KEITH MAYS** : **VIOLATIONS:**  
: **18 U.S.C. § 2113(a) (bank robbery - 2**  
: **counts)**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about December 31, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEITH MAYS**

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Sovereign Bank, lawful currency of the United States, that is, \$3,043, belonging to, and in the care, custody, control, management and possession of the Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 3, 2011, in Philadelphia, in the Eastern District of Pennsylvania,  
defendant

**KEITH MAYS**

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Trumark Credit Union, lawful currency of the United States, that is, \$671, belonging to, and in the care, custody, control, management and possession of the Trumark Credit Union, the deposits of which were insured by the National Credit Union Administration Board.

In violation of Title 18, United States Code, Section 2113(a).

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**